

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KIMBERLY BOTTOMS, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

BLOCK, INC. (F/K/A, SQUARE, INC.) (D/B/A,  
CASH APP),

Defendant.

No. 2:23-cv-01969-MJP

**SECOND JOINT STIPULATION  
OF FACTS RE: BRIEFING ON  
BLOCK’S MOTION FOR  
SUMMARY JUDGMENT ON  
PLAINTIFF’S INDIVIDUAL  
CLAIMS**

Plaintiff Kimberly Bottoms (“Plaintiff”), and Defendant Block, Inc. (“Block”), by and  
through their counsel, stipulate and agree as follows:

1. The parties have conferred regarding documents Block has produced and marked  
as “Confidential” and the need for sealing documents relevant to Plaintiff’s opposition to Block’s  
motion for summary judgment. The parties agree to the following factual stipulations for  
purposes of briefing on Block’s motion for summary judgment on Plaintiff’s individual claims,  
including Plaintiff’s opposition thereto.

2. Solely for purposes of briefing on Block’s motion for summary judgment on  
Plaintiff’s individual claims (and Plaintiff’s opposition thereto), the parties stipulate and do not  
dispute that the following facts are true and undisputed with regard to Plaintiff’s individual  
claims against Block:

a. Block's data reflects that Cash App user Lisa Cook initiated Invite Friends text messages to phone number 360-775-9959 on March 30, 2022 and March 22, 2023.

IT IS SO STIPULATED.

DATED this 21st day of January, 2025.

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*Attorneys for Plaintiff Kimberly Bottoms*

**[PROPOSED] ORDER**

The Court GRANTS the Parties' Second Stipulation of Facts.

IT IS SO ORDERED this 24th day of January, 2025.

A handwritten signature in black ink, reading "Marsha J. Pechman", written over a horizontal line.

Marsha J. Pechman  
United States District Judge